Clean Air Facts

Reporting Emissions on DNR's Annual Air Emissions Inventory

Each spring, nearly two thousand businesses in Wisconsin report data on the air pollution that they generated during the previous calendar year to the Department of Natural Resources' (DNR's) Bureau of Air Management. The reporting requirements are spelled out in chapter NR 438 of the Wisconsin Administrative Code (Wis. Adm. Code) and the fees that are billed for the emissions reported are covered in chapter NR 410. *Read the note at the end on changes pending in 2004 or 2005.*

What Are the Requirements?

Anyone who owns or operates a facility that emits air pollution may be required to report the amounts of air pollutant they emit to DNR on an annual basis. DNR has a list of air pollutants that a business must report data on if the emissions are greater than specified thresholds. This list is found in Table 1 of chapter NR 438, Wis. Adm. Code, and is attached as an appendix to this fact sheet.

Not all air pollutants are "billable", even though you may be required to report them. At this time, DNR does not bill for carbon dioxide or carbon monoxide emissions. Also, if you have a pollutant that is considered both a volatile organic compound (VOC) or particulate matter (PM) and a hazardous air pollutant (HAP) you are only billed once.

Will My Business Be Affected?

If your actual emissions of any pollutant that DNR lists in chapter NR 438 is over its threshold shown in Table 1, then you have to report the emissions (i.e., in pounds or tons per year) for each calendar year. DNR sends out the reporting information the first week of January each year to facilities it believes had emissions during the previous calendar year that must be reported. The reports of the facilities' emissions are due back to DNR by

March 1st of that year. After the reports are received, DNR calculates the fees and sends a summary to the facility. The facility then certifies that the emissions and fees calculated from them are accurate. Finally, DNR send out the bills for the fees in June.

Only sources that must obtain an operation permit under chapter NR 407, Wis. Adm. Code, and have more than five tons total of "billable" pollutants are required to pay the air emission fees. The fee is set at **$35.71 per ton** of emissions as of the 2001 emissions report. Contact the Small Business Clean Air Assistance Program (SBCAAP) to get the fact sheet on **Operation Permits for Small Businesses** to help determine whether you are required to get a permit.

If Affected, What Do I Have To Do To Comply?

If you are not sure what your emissions are, contact SBCAAP and we can help you get started.

If you know your facility emissions are above the thresholds in Table 1 of chapter NR 438, Wis. Adm. Code, you should contact the DNR to supply the appropriate information to get started reporting the annual emissions. You can contact Ralph Patterson at 608/267-7546 or your local

DNR Air Program compliance inspector. Contact the SBCAAP for a list of DNR Air Program contacts by their area of responsibility.

As of the reporting year 2001, more than 99% of those reporting update their annual information using a computer program called the Consolidated Reporting System or CRS. In January of each year, facilities are sent a reporting packet. This packet contains both the diskettes with the CRS program for installation on their individual computer and paper copies of instructions and other information. The program itself does not take up a large amount of space on a computer and will operate on any computer that runs Windows 95 or better or an Apple that has a Windows interface.

Instead of receiving the diskettes in the mail, there is the option of being sent an email containing a web link to an Internet web page where you can download the CRS program as well as obtain the instructions and other material electronically. DNR has found that transferring the information back and forth electronically through email is both economical and convenient. As of the January 2002 mailing, close to half those reporting are exchanging the program and the final data files via email and the internet. DNR expects that number to increase steadily over the next couple years.

Key Items Needed For Compliance

If you have reported emissions in previous years, you will continue to receive a reporting package sometime in the first or second week of January each year until your emissions are below the reporting thresholds or the facility shuts down. Skip down to the *Tips* section.

If you have not reported before, you will need to do the following things:

❑ Figure out the type of pollutants your facility emits: Particulate matter, PM_{10}, sulfur dioxide, nitrogen oxides, carbon monoxide, volatile organic compounds and hazardous air pollutants.

❑ Determine the quantities of those pollutants emitted from your facility. Contact SBCAAP for

assistance in performing the calculations if you are unsure.

Once you know your emissions are above the reporting thresholds, you will need to gather other information for the DNR's reporting program.

❑ Data regarding each process or emissions unit at your facility, including size, maximum rated throughput capacity and actual operating data such as hours of operation and throughput of raw material and/or product for the year.

❑ Material Safety Data Sheets (MSDS) for raw materials (such as inks, paints, coatings, adhesives, etc.) used in the process.

❑ Any emission factors you may have for the processes at the facility. Emission factors are used to calculate the air emission rates. Process throughput or fuel use is multiplied by the emission factor to determine the emission rate. You can find many emission factors at USEPA's web site: www.epa.gov/ttn/chief/. Contact SBCAAP if you do not have internet access.

❑ Any emissions testing data you have available on the processes you operate, whether from a test done on-site or done on a similar unit obtained either from another plant under a parent corporation or from the manufacturer. This is generally preferred since the resulting emission rates will be more accurate than generic emission factors.

Tips for Those Already Reporting

If you are already reporting, there are things to remember that will help things go more smoothly.

❑ **Read the instructions** provided with the reporting materials. DNR has done a very thorough job of making sure information to help you figure out the program is easy to find and concise.

❑ Provide an **explanation of changes** needed on items such as emission factors or to the process information.

❑ **Discuss changes with your DNR inspector** as changes they make will be easier from their computer because it is directly linked to the whole reporting system.

❑ **Pay attention to the units** each material is reported as (pounds per ton material - lb/ton, pounds per cubic foot gas - lb/cu ft, pounds per million BTU - lb/mmBtu, etc.) or your emissions totals could end up wildly inaccurate once the computer runs the calculations. Fuel use reporting can be particularly tricky. Usually it is reported to DNR as million BTU (mmBtu) per year, but the company may get invoices in therms. Someone who doesn't know the difference may just take the number of therms. If you do this incorrectly, you may end up reporting emissions that are hundreds of times larger than what they should be. You'll only catch this if you are paying attention to the final report that DNR sends back for your approval in June.

NOTE: DNR is proposing changes to the State hazardous air pollutant rule, in ch. NR 445, Wis. Adm. Code, that may become effective in 2003. A key element of the change is the addition of a number of new pollutants to the list of those regulated, as well as changes (some more and some less stringent) to the regulated thresholds for many of the existing pollutants.

Since the reporting thresholds for ch. NR 438 are based on the regulated thresholds in ch. NR 445, there will be many changes you should be on the look out for even if you are not otherwise affected by ch. NR 445. If we assume the rule is revised in 2003 then starting with the emissions reporting for calendar year 2004, you will need to track emissions of any new pollutant on the list. Then for the report due March 1, 2005, you will need to report the 2004 emissions for any pollutant that is over the new thresholds (whether a new or existing pollutant). Once the rule is revised, ch. NR 438 will have a Table 2 that will list all the new thresholds.

To find out more about the changes to ch. NR 445, you can go to DNR's web site at **http://www.dnr.state.wi.us/org/aw/air/hot/NR445rev/NR445rev.htm** (keeping the address all on one line in your browser) or contact the SBCAAP contacts below.

Contacts for More Information or Assistance.

The Small Business Clean Air Assistance Program helps smaller businesses understand and comply with the Clean Air Act regulations. Contact one of the program's Clean Air Specialists for more assistance: Renée Lesjak Bashel at 608/264-6153 or Tom Coogan at 608/267-9214.

For further information on the Emissions Inventory contact your DNR Regional or Service Center office shown on the **DNR Contact Fact Sheet** or Ralph Patterson at DNR's Central office at 608/267-7546.